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February 14, 2023  
*VIA ECF*

The Honorable Sarah Netburn  
United States District Court, SDNY  
40 Foley Square, Room 219  
New York, New York 10007

**Re: *Nike, Inc. v. StockX LLC*, Case No. 1:22-cv-00983-VEC (S.D.N.Y.)**

**Dear Judge Netburn:**

Plaintiff Nike, Inc. (“Nike”) respectfully submits this letter requesting the Court approve Nike’s proposed redactions to portions of the transcript of the December 30, 2022 discovery conference before the Court (the “Dec. 30 Transcript”). Nike’s proposed redactions to the Dec. 30 Transcript are set forth in Exhibit A to Nike’s January 30, 2023 Letter Motion.<sup>1</sup> (Dkt. 123). StockX does not object to Nike’s proposed redactions to the Dec. 30 Transcript.

As stated in Nike’s Letter Motion (Dkt. 121), good cause exists to seal these portions of the Dec. 30 Transcript given the commercially sensitive nature of the highly confidential information discussed at the hearing. Each of Nike’s proposed redactions encompasses discussion of specific, non-public information and references to material that Nike has designated as highly confidential pursuant to the Stipulated Protective Order entered in this action. (Dkt. 52).

The Court has previously acknowledged the sensitivity of such highly confidential information in so ordering the Stipulated Protective Order, sealing other portions of the Dec. 30 Transcript from the bench when such information was discussed, and granting Nike’s motion to seal references to such information in prior letters filed with the Court (*see e.g.*, Dkt. 92, 103). Nike therefore respectfully requests that the Court approve the proposed redactions to the Dec. 30 Transcript in order to prevent public disclosure of this commercially sensitive, highly confidential information.

Nike thanks the Court for its consideration of this matter.

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<sup>1</sup> The word “but” at page 6, line 19 of the Dec. 30 Transcript was inadvertently highlighted and need not be redacted.

Respectfully submitted,

A handwritten signature in blue ink, reading "Tamar Y. Duvdevani". The signature is written in a cursive, flowing style.

Tamar Y. Duvdevani  
*Counsel for Plaintiff Nike, Inc.*

cc: Counsel of Record via ECF